

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

EMMANUEL C. GONZALEZ,	§	
Plaintiff	§	Civil Action No. 2:14-cv-770 [JRG]
v.	§	
	§	Jury Trial Demanded
HOMES.COM, INC.,	§	
Defendant	§	

**DEFENDANT HOMES.COM, INC.'S UNOPPOSED MOTION FOR AN ADDITIONAL  
EXTENSION OF TIME TO ANSWER PLAINTIFF'S ORIGINAL COMPLAINT**

Defendant Homes.com, Inc., without waiving any defenses or any matters that might be presented pursuant to FEDERAL RULE OF CIVIL PROCEDURE 12(b) or any other rule or law, files this unopposed motion for an additional extension of time in which to answer, move, or otherwise respond to Plaintiff Emmanuel C. Gonzalez's Original Complaint.

Counsel for Defendant and counsel for Plaintiff have been attempting to determine whether or not a mutually-agreeable solution can be reached in order to resolve this matter in the earliest stages. The parties believe that this extension will allow them the ability to further discuss this issue and hopefully reach a mutually-agreeable resolution to this case. Good cause exists as a mutually-agreeable compromise, if reached, would remove this matter from the Court's docket without further issue. Additionally, counsel for Defendant, Mr. Steven J. Rocci, was unavailable due to travel in August, and early September, and this hampered his ability to make progress during that time. Accordingly, Defendant Homes.com, Inc. has requested and Plaintiff does not oppose an additional fifteen (15) day extension of Homes.com Inc.'s time to respond in any manner whatsoever including answer, motion or other pleading of any type to Plaintiff's Original Complaint. Specifically, Homes.com, Inc. requests an extension of time up to and including October 8, 2014. This extension is not sought for a delay but so that the parties

may continue their discussions in furtherance of an early resolution. A proposed Order accompanies this Unopposed Motion.

Dated: September 22, 2014

Respectfully submitted,

By: /s/ Michael E. Jones

Michael E. Jones

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**ATTORNEYS FOR DEFENDANT  
HOMES.COM, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service and are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 22, 2014.

/s/ Michael E. Jones

Michael E. Jones